

EXHIBIT 4

NEXSEN PRUET

Angus H. Macaulay
Member
Certified Specialist in Employment and Labor Law
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October 20, 2021

VIA EMAIL

Robert D. Dodson, Esquire
The Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 20
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Re: *John Hawkins and HawkLaw, PA v. The South Carolina Commission on
Lawyer Conduct and The South Carolina Office of Disciplinary Counsel*
Civil Action No. 3-21-cv-01319-JMC

Dear Robert:

Austin
Charleston
Charlotte

We received your clients' October 14, 2021, responses to Defendant South Carolina Disciplinary Counsel's first set of Interrogatories and Requests for Production in the above-referenced matter.

Columbia

Greensboro
Greenville
Bluffton / Hilton Head
Myrtle Beach
Raleigh

I note at the outset that our initial review of the responses finds that they are incomplete in several instances, including, but not limited to, the responses to Interrogatory Nos. 5-7, 9-13, and 15- 18 and Requests for Production Nos. 4, and 7-10. Further, the objections are without merit and should be withdrawn. Additionally, your objections concerning allegedly "confidential and proprietary" information and/or documents (Interrogatories Nos. 5-7, 9-13, 15-18 and Requests for Production Nos. 7-10) can be addressed with a confidentiality order agreed to by the parties. As you are claiming a privilege, per your response to Request to Produce No. 4, then you need to produce a privilege log.

We intend to send you a more detailed letter outlining the deficiencies in the October 14th responses. However, we propose that further consultation concerning these and other deficiencies and/or a subsequent Motion to Compel be held in abeyance and discovery stayed pending Judge Childs' decision on the Defendants' pending October 11, 2021 Motion to Dismiss the Plaintiffs' Complaint. Therefore, we suggest that the parties file a Consent Motion to Stay Discovery.

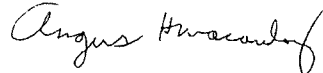
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Robert Dodson
October 20, 2021
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Please let me know, in writing, by the close of business on Thursday, October 21st, if you will agree to join in a Consent Motion to Stay Discovery, which we will prepare. If not, we will file the Motion to Stay Discovery and state your unwillingness to consent.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Angus H. Macaulay".

Angus H. Macaulay

AHM/mjm